

EXHIBIT A

Law Office of
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June 22, 2022

*Also Member NJ Bar

HM Distribution LLC
2167 China Place, Unit B
Chicago, IL 60616

VIA CERTIFIED MAIL NO.
70210350000056864575

Re: Corbin, et al. v. HM Distribution LLC a/k/a Taos Global Group, et al.

To Whom It May Concern:

Enclosed please find a true and correct copy of the Complaint, the original of which has been filed with the Court of Common Pleas, Philadelphia County, Pennsylvania. Kindly take whatever action is deemed appropriate to protect your company's interests.

Very truly yours,

LAW OFFICE OF MARC R. GORDON, P.C.

CHRISTOPHER S. FROBA

CSF/mmi
Enclosure

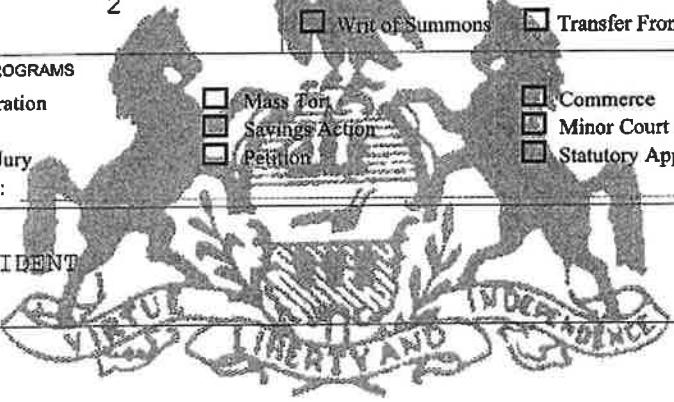
Court of Common Pleas of Philadelphia County
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

JUNE 2022

E-Filing Number: 2206042862

001941

PLAINTIFF'S NAME DARNELL CORBIN		DEFENDANT'S NAME HM DISTRIBUTION LLC, ALIAS: TAOS GLOBAL GROUP		
PLAINTIFF'S ADDRESS 1703 N. 16TH STREET APT. B PHILADELPHIA PA 19121		DEFENDANT'S ADDRESS 2167 CHINA PLACE UNIT B CHICAGO IL 60616		
PLAINTIFF'S NAME SHANEEN DAVIS		DEFENDANT'S NAME ZHONGBIN GAO		
PLAINTIFF'S ADDRESS 1703 N. 16TH STREET APT. B PHILADELPHIA PA 19121		DEFENDANT'S ADDRESS 13720 45TH AVENUE APT. 4Z FLUSHING NY 11355		
PLAINTIFF'S NAME		DEFENDANT'S NAME		
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS		
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ or Summons <input type="checkbox"/> Transfer From Other Jurisdictions		
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Jury <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Other:	<input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition	<input type="checkbox"/> Commerce <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals	<input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT				
STATUTORY BASIS FOR CAUSE OF ACTION				
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) FILED PRO PROTBY JUN 21 2022 I. LOWELL				IS CASE SUBJECT TO COORDINATION ORDER? YES NO
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>DARNELL CORBIN , SHANEEN DAVIS</u> Papers may be served at the address set forth below.				
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY CHRISTOPHER S. FROBA		ADDRESS 101 GREENWOOD AVENUE SUITE 460 JENKINTOWN PA 19046		
PHONE NUMBER (215) 600-1244	FAX NUMBER (215) 600-1245			
SUPREME COURT IDENTIFICATION NO. 93616		E-MAIL ADDRESS christopher.froba@gmail.com		
SIGNATURE OF FILING ATTORNEY OR PARTY CHRISTOPHER FROBA		DATE SUBMITTED Tuesday, June 21, 2022, 05:23 pm		

LAW OFFICE OF MARC R. GORDON, P.C.
 BY: CHRISTOPHER S. FROBA
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MAJOR CASE
 Filed and Accepted by the
 Office of Judicial Records
 ATTORNEY FOR PLAINTIFFS
 7/15/2022 1:23 PM
 T. DONELLY
 PHILADELPHIA DISTRICT OF PENNSYLVANIA

DARNELL CORBIN	:	COURT OF COMMON PLEAS
and	:	PHILADELPHIA COUNTY
SHANEEN DAVIS	:	
Plaintiffs,	:	JUNE TERM, 2022
v.	:	NO.
HM DISTRIBUTION LLC a/k/a TAOS	:	
GLOBAL GROUP	:	
and	:	
ZHONGBIN GAO	:	
Defendants.	:	

COMPLAINT IN CIVIL ACTION PERSONAL INJURY - MOTOR VEHICLE ACCIDENT

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
 LAWYER REFERRAL SERVICE

1101 Market Street, 11th Floor
 Philadelphia, PA 19107
 Telephone: (215) 238-6333

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACIÓN DE LICENCIADOS DE FILADELPHIA
 SERVICIO DE REFERENCIA E INFORMACIÓN LEGAL

1101 Market Street
 Philadelphia, PA 19107
 Teléfono: (215) 238-6333

1. Plaintiff DARNELL CORBIN is an adult individual currently residing at 1703 N. 16th Street, Apt. B, Philadelphia, PA 19121.
2. Plaintiff SHANEEN DAVIS is an adult individual currently residing at 1703 N. 16th Street, Apt. B, Philadelphia, PA 19121.
3. Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP is a business organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2167 China Place, Unit B, Chicago, IL 60616.
4. Defendant ZHONGBIN GAO is an adult individual currently residing at 13720 45th Avenue, Apt. 4Z, Flushing, NY 11355.
5. The facts that give rise to the cause of action occurred on or about November 23, 2020 at approximately 5:30 p.m.
6. On November 23, 2020, a motor vehicle accident occurred at or near the intersection of Greene Street and Johnson Street in Philadelphia, Pennsylvania.
7. At the time of the accident, Plaintiff DARNELL CORBIN was operating a motor vehicle North on Greene Street and his passenger was Plaintiff SHANEEN DAVIS.
8. At the time of the accident, Defendant ZHONGBIN GAO was operating a motor vehicle owned by Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP and was traveling West on Johnson Street near the motor vehicle being operated by Plaintiff DARNELL CORBIN.
9. At the aforementioned time and place, Defendant ZHONGBIN GAO was unlawfully operating Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP's motor vehicle, i.e., he disregarded a red traffic signal and, as a result, he struck Plaintiffs' motor vehicle with great force.

10. At the aforementioned time and place, Defendant ZHONGBIN GAO failed to observe Plaintiffs' vehicle which was lawfully traveling on Greene Street at or near its intersection with Johnson Street.

11. At the aforementioned time and place, Defendant ZHONGBIN GAO was acting as an agent, servant, and/or employee of Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP and was acting in the course and scope of his agency, servitude, and/or employment with Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP, owner of the motor vehicle that he was operating, when he collided with Plaintiffs' motor vehicle.

12. As a direct and proximate result of the accident and Defendants' negligence, Plaintiff DARNELL CORBIN sustained severe and disabling injuries to his neck, back and left leg that are believed and averred to be permanent, which include but are not limited to: injuries to his neck and cervical spine, back and thoracic/lumbar spine and left leg including the bones, soft tissue, muscle, nerve and supportive structures.

13. The motor vehicle accident has left Plaintiff DARNELL CORBIN susceptible to additional injuries in the future to those areas weakened by accident.

14. As a direct and proximate result of the accident and Defendants' negligence, Plaintiff DARNELL CORBIN has undergone in the past and in the future will continue to undergo great pain and suffering.

15. As a further result of the accident and Defendants' negligence, Plaintiff DARNELL CORBIN has been obliged to seek medical treatment in and about an effort to cure himself of all of his injuries and has incurred medical expenses as a result thereof.

16. As a direct and proximate result of the injuries sustained in the accident and

Defendants' negligence, Plaintiff DARNELL CORBIN has suffered a permanent diminution of his ability to enjoy life and life's pleasures.

17. As a direct and proximate result of the injuries sustained in the accident and Defendants' negligence, Plaintiff DARNELL CORBIN has suffered a permanent loss of his earning power and earning capacity.

18. As a direct and proximate result of the injuries sustained in the accident and Defendants' negligence, Plaintiff DARNELL CORBIN has been advised this his injuries may be permanent in nature and effect.

19. As a direct and proximate result of the accident and Defendants' negligence, Plaintiff SHANEEN DAVIS sustained severe and disabling injuries to her head, neck, back and left leg that are believed and averred to be permanent, which include but are not limited to: injuries to her head, neck and cervical spine, back and thoracic/lumbar spine and left leg including the bones, soft tissue, muscle, nerve and supportive structures.

20. The motor vehicle accident has left Plaintiff SHANEEN DAVIS susceptible to additional injuries in the future to those areas weakened by accident.

21. As a direct and proximate result of the accident and Defendants' negligence, Plaintiff SHANEEN DAVIS has undergone in the past and in the future will continue to undergo great pain and suffering.

22. As a further result of the accident and Defendants' negligence, Plaintiff SHANEEN DAVIS has been obliged to seek medical treatment in and about an effort to cure herself of all of her injuries and has incurred medical expenses as a result thereof.

23. As a direct and proximate result of the injuries sustained in the accident and Defendants' negligence, Plaintiff SHANEEN DAVIS has suffered a permanent diminution of

her ability to enjoy life and life's pleasures.

24. As a direct and proximate result of the injuries sustained in the accident and Defendants' negligence, Plaintiff SHANEEN DAVIS has suffered a permanent loss of her earning power and earning capacity.

25. As a direct and proximate result of the injuries sustained in the accident and Defendants' negligence, Plaintiff SHANEEN DAVIS has been advised this her injuries may be permanent in nature and effect.

26. The accident was in no way caused or contributed to by Plaintiffs and was solely caused by Defendants for the reasons set forth below.

COUNT I

NEGLIGENCE

DARNELL CORBIN v. ZHONGBIN GAO

27. Paragraphs 1 through 26 of the Complaint are incorporated herein by reference and made a part thereof as if set forth in full.

28. The negligence, carelessness, and recklessness of Defendant ZHONGBIN GAO consisted of the following:

- a. Operating his vehicle at an excessive rate of speed under the circumstances and road conditions;
- b. Failing to have his vehicle under proper and adequate control;
- c. Failing to apply the brakes in time to avoid the collision with Plaintiff;
- d. Failing to keep a reasonable lookout for other vehicles lawfully on the roadway;
- e. Failing to operate his vehicle according to existing traffic controls;
- f. Operating his vehicle in a manner so as to create a dangerous situation for other

- vehicles on the roadway;
- g. Operating his vehicle in an unsafe manner given the road conditions prevailing at the time;
 - h. Violation of the "Assured Clear Distance" rule; and,
 - i. On information and belief, operation of a motor vehicle while distracted.

29. Accordingly, Defendant ZHONGBIN GAO is liable to Plaintiff DARNELL CORBIN in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT II

NEGLIGENCE

DARNELL CORBIN v. HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP

30. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1 through 29 as if same were set forth at length herein.

31. The carelessness and recklessness of Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP consisted of the following:

- a. Failing to properly train its employees;
- b. Permitting an incompetent and inexperienced driver to operate its motor vehicle;
- c. Negligent entrustment of a motor vehicle for operation; and,
- d. Respondent superior and responsibility for acts and omissions of agent, servant, and employee.

32. Accordingly, Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP is liable to Plaintiff DARNELL CORBIN in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT III

NEGLIGENCE

SHANEEN DAVIS v. ZHONGBIN GAO

33. Paragraphs 1 through 32 of the Complaint are incorporated herein by reference and made a part thereof as if set forth in full.

34. The negligence, carelessness, and recklessness of Defendant ZHONGBIN GAO consisted of the following:

- a. Operating his vehicle at an excessive rate of speed under the circumstances and road conditions;
- b. Failing to have his vehicle under proper and adequate control;
- c. Failing to apply the brakes in time to avoid the collision with Plaintiff;
- d. Failing to keep a reasonable lookout for other vehicles lawfully on the roadway;
- e. Failing to operate his vehicle according to existing traffic controls;
- f. Operating his vehicle in a manner so as to create a dangerous situation for other vehicles on the roadway;
- g. Operating his vehicle in an unsafe manner given the road conditions prevailing at the time;
- h. Violation of the "Assured Clear Distance" rule; and,
- i. On information and belief, operation of a motor vehicle while distracted.

35. Accordingly, Defendant ZHONGBIN GAO is liable to Plaintiff SHANEEN DAVIS in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT II

NEGLIGENCE

SHANEEN DAVIS v. HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP

36. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1 through 35 as if same were set forth at length herein.

37. The carelessness and recklessness of Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP consisted of the following:

- a. Failing to properly train its employees;
- b. Permitting an incompetent and inexperienced driver to operate its motor vehicle;
- c. Negligent entrustment of a motor vehicle for operation; and,
- d. Respondeat superior and responsibility for acts and omissions of agent, servant, and employee.

38. Accordingly, Defendant HM DISTRIBUTION LLC a/k/a TAOS GLOBAL GROUP is liable to Plaintiff SHANEEN DAVIS in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

WHEREFORE, Plaintiffs DARNELL CORBIN and SHANEEN DAVIS each demand judgment against each Defendant, individually, jointly and/or severally in an amount in excess of the amount requiring compulsory arbitration, i.e., Fifty Thousand Dollars (\$50,000.00).

LAW OFFICE OF MARC R. GORDON, P.C.

BY:


CHRISTOPHER S. FROBA
Attorney for Plaintiffs

VERIFICATION

CHRISTOPHER S. FROBA, hereby states that he is the attorney for Plaintiffs herein, and that as such he is authorized to take this verification on their behalf and that the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of his knowledge, information and belief. This verification is subject to 18 Pa. C.S. § 4904 which provides for certain penalties for making false statements.



CHRISTOPHER S. FROBA
Attorney for Plaintiff